

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re SONY BMG CD TECHNOLOGIES
LITIGATION

This Document Relates To:

ALL ACTIONS.

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Civil Action No. 05-CV-09575-NRB

CLASS ACTION

**NOTICE OF MOTION AND MOTION TO ADMIT COUNSEL *PRO HAC VICE* AND
DECLARATIONS OF ROBERT M. ROTHMAN AND ROBERT S. GREEN IN
SUPPORT THEREOF**

PLEASE TAKE NOTICE upon the annexed Declaration of Robert S. Green, executed this 26 day of February, 2006, and the Certificate of Good Standing attached thereto, and the Declaration of Robert M. Rothman, Plaintiffs Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher move this Court, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, that Robert S. Green, a member of the Bar of the State of California, be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

DATED: February 28, 2006

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
ROBERT M. ROTHMAN (RR-6090)

A handwritten signature in black ink, appearing to read "Robert Rothman", written over a horizontal line.

ROBERT M. ROTHMAN

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DECLARATION OF ROBERT M. ROTHMAN

I, Robert M. Rothman, declare as follows:

1. I am a member in good standing of the bar of this Court and a partner at Lerach Coughlin Stoia Geller Rudman & Robbins LLP. I make this declaration in support of Plaintiffs Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher's Motion, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, that Robert S. Green be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

2. Robert S. Green is fully familiar with this action.

3. As evidenced in the annexed Declaration of Robert S. Green, he is an attorney in good standing of the Bar of the State of California.

4. I respectfully request that plaintiffs' motion be granted in all respects. A proposed Order is enclosed herewith.

I declare under penalty of perjury under the laws of the State of New York, that the foregoing is true and correct.

DATED: February 28, 2006

A handwritten signature in black ink, appearing to read "Robert Rothman", written over a horizontal line.

ROBERT M. ROTHMAN (RR-6090)

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

SONY BMG CD
TECHNOLOGIES LITIGATION

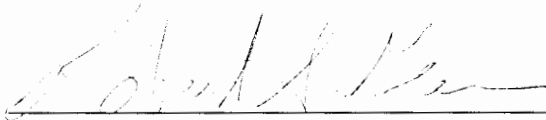
Case No. 1:05-cv-09575-NRB

**DECLARATION OF ROBERT S. GREEN IN SUPPORT OF
MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE**

Robert S. Green, declares under penalty of perjury this 26th day of February , 2006:

1. I am an attorney at the law firm of Green Welling LLP, 595 Market Street, Suite 2750, San Francisco, California 94105.
2. I submit this Declaration in support of my motion for admission pro hac vice in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the United States District Court for the Northern District of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this one case on behalf of plaintiffs Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher.

I hereby swear under penalty of perjury that the foregoing is true and correct.



Robert S. Green



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

February 22, 2006

TO WHOM IT MAY CONCERN:

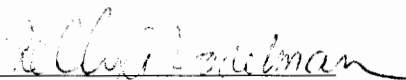
This is to certify that according to the records of the State Bar, ROBERT STANLEY GREEN, #136183, was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1988; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Salfiti
Custodian of Membership Records

CERTIFICATE OF SERVICE

I, Kelly A. Stadelmann, hereby certify that on March 1, 2006, I caused a true and correct copy of the attached Notice of Motion and Motion to Admit Counsel *Pro Hac Vice* to be served by first-class mail to all counsel on the attached service list.


Kelly A. Stadelmann

Service List

<p>Scott A. Kamber (SK-5794) KAMBER & ASSOCIATES, LLC 19 Fulton Street, Suite 400 New York, New York 10038 Telephone: 212/571-2000 212/202-6364 (fax)</p> <p><i>Plaintiffs' Co-Lead Counsel</i></p>	<p>Sanford P. Domain (SD-8712) Peter Safirstein (PS-6176) MILBERG WEISS BERSHAD & SCHULMAN LLP One Pennsylvania Avenue New York, New York 10119-0165 Telephone: 212/594-5300 212/868-1229 (fax)</p> <p><i>Plaintiffs' Executive Committee</i></p>
<p>Ira M. Press (IP-5313) Mark A. Strauss (MS-2288) KIRBY McINERNEY & SQUIRE, LLP 830 Third Avenue New York, New York 10022 Telephone: 212/317-2000 212/751-2540 (fax)</p> <p><i>Plaintiffs' Executive Committee</i></p>	<p>Jason L. Solotaroff (JS-5739) Oren Giskan (OG-3667) GISKAN & SOLOTAROFF 207 West 25th Street New York, New York 10001 Telephone: 212/847-8315 212/473-8096 (fax)</p> <p><i>Plaintiffs' Executive Committee</i></p>
<p>David Nester NESTER & CONSTANCE, P.C. 123 West Washington Street Belleville, Illinois 62220-2021 Telephone: 618/234-4440 618/234-6193 (fax)</p> <p><i>Counsel for Plaintiffs</i></p>	<p>Robert I. Lax (RL-8413) ROBERT I. LAX & ASSOCIATES 535 Fifth Avenue, 21st Floor New York, New York 10017 Telephone: 212/818-9150 212/818-1266 (fax)</p> <p><i>Counsel for Plaintiffs</i></p>
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